

Eric M. Creizman

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MEMO ENDORSED

Granted on consent.

/s/ Lewis A. Kaplan
Dated: August 12, 2020

August 11, 2020

By ECF and Email

The Honorable Lewis A Kaplan
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Donald LaGuardia, 19-CR-893 (LAK)*

Dear Judge Kaplan:

On behalf of Donald LaGuardia, I am writing to respectfully request that the Court order a temporary modification to Mr. LaGuardia's conditions of pretrial release to permit him to drive his daughter to Quinnipiac University in Hamden, Connecticut on Monday, August 17, 2020, and to help her move into her residence there for the 2020-2021 school year. Mr. LaGuardia would return to his home in New Jersey later that night. Neither the government nor Pretrial Services oppose this request.

Mr. LaGuardia's conditions of release include a \$1 million personal recognizance bond, secured by \$75,000 in cash plus three properties, and four financially responsible sureties. His travel is restricted to the District of New Jersey and the Southern and Eastern Districts of New York. To date, Mr. LaGuardia has complied with all of the conditions of his pretrial release.

I thank the Court for its consideration in this matter.

Respectfully,

/s/ Eric M. Creizman
Eric M. Creizman